

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan

*Attorneys for Irving H. Picard,
Trustee for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor,

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SONJA KOHN, et al.,

Defendants.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-05411 (SMB)

STIPULATION AND ORDER EXTENDING TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, and defendants Sonja Kohn, Infovaleur, Inc. and Tecno Development & Research, Ltd. (the “Defendants”), by their undersigned counsel, that the time by which the Defendants may respond to the Motion for Leave to File a Third Amended Complaint filed by the Trustee is extended up to and including February 4, 2016. It is further stipulated and agreed that the Trustee shall file his reply on or before February 25, 2016. The return date for this matter is set for March 30, 2016 at 10:00 a.m.

The purpose of this stipulated extension (the “Stipulation”) is to provide additional time for the Defendants to respond to the Motion to Amend. The extension of time granted by this Stipulation is without prejudice to any future extensions of time.

Undersigned counsel for the Defendants represent that service of process of the summons and Complaint on the Defendants has been completed, and hereby waives any defenses based on insufficiency of process or insufficiency of service of process on behalf of the Defendants.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: October 23, 2015
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Marc Skapof
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Marc Skapof
Email: mskapof@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the estate
of Bernard L. Madoff*

**NEUBERGER, QUINN, GIELEN, RUBIN, GIBBER,
P.A.**

By: /s/ Nathan D. Adler
One South Street, 27th Floor
Baltimore, Maryland 21202
Telephone: (410) 332-8584
Facsimile: (410) 332-8561
Isaac Neuberger
Email: imn@nqgrg.com
Price O. Gielen
Email: pog@nqgrg.com
Nathan D. Adler
Email: nda@nqgrg.com

*Attorneys for Defendants Sonja Kohn,
Infovaleur and Tecno Gibraltar*

SO ORDERED this 23rd day of October,
2015.

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE